

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

DAWSON M. ROUSE

**SECOND SUPERSEDING
INDICTMENT**

Case No. 1:20-cr-107

Violations: 18 U.S.C. §§ 1470, 2251(a),
2251(e), 2252(a)(2), 2252(b)(1), 2422(b),
and 2428

COUNT ONE

Attempted Sexual Exploitation of a Child

The Grand Jury Charges:

From in or about January 2020 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, E.V., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about January 2020 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce E.V., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT THREE

Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about January 2020 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce a minor, namely, M.G., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FOUR

Transfer of Obscene Materials to a Minor

The Grand Jury Further Charges:

From in or about January 2020 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, M.G., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.

COUNT FIVE

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about March 2020 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.D., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT SIX

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce R.J., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT SEVEN

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about January 2019 to in or about April 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, A.B., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT EIGHT

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

In or about April 2019, in the District of North Dakota,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.B., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT NINE

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about March 2019 to in or about September 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, M.R., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about March 2019 to in or about September 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce M.R., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT ELEVEN

Transfer of Obscene Materials to a Minor

The Grand Jury Further Charges:

From in or about March 2019 to in or about September 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, M.R., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.

COUNT TWELVE

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about February 2018 to in or about June 2018, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, B.T., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THIRTEEN

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about January 2019 to in or about December 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, L.W., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FOURTEEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about January 2019 to in or about December 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce L.W., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT FIFTEEN

Transfer of Obscene Materials to a Minor

The Grand Jury Further Charges:

From in or about January 2019 to in or about December 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, L.W., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.

COUNT SIXTEEN

Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce a minor, namely, J.T., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT SEVENTEEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly persuade, induce, entice, and coerce J.T., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT EIGHTEEN

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about January 2020 to in or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, C.L., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT NINETEEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about January 2020 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce C.L., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY

Transfer of Obscene Materials to a Minor

The Grand Jury Further Charges:

From in or about January 2020 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, C.L., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.

COUNT TWENTY-ONE

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, D.B., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWENTY-TWO

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce D.B., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY-THREE

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about September 2018 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, G.L., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWENTY-FOUR

Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about February 2019 to in or about May 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce a minor, namely, K.B., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWENTY-FIVE

Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about January 2018 to in or about December 2018, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce a minor, namely, C.S., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWENTY-SIX

Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about March 2020 to in or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce a minor, namely, P.V., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWENTY-SEVEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about March 2020 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce P.V., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY-EIGHT

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about January 2020 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of M.G. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT TWENTY-NINE

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about March 2019 to in or about September 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of M.R. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THIRTY

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about December 2019 to in or about May 2020, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of D.B. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THIRTY-ONE

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about February 2019 to in or about May 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of K.B. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THIRTY-TWO

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about January 2018 to in or about December 2018, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of C.S. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THIRTY-THREE

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about March 2020 to in or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received visual depictions of P.V. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THIRTY-FOUR

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about April 2019 to in or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, A.S., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THIRTY-FIVE

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about April 2019 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.S., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT THIRTY-SIX

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

In or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, A.J.M., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THIRTY-SEVEN

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

In or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.J.M., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT THIRTY-EIGHT

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about June 2019 to in or about April 2020, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, R.P., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THIRTY-NINE

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about June 2019 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce R.P., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT FORTY

Transfer of Obscene Materials to a Minor

The Grand Jury Further Charges:

From in or about June 2019 to in or about April 2020, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, R.P., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.

COUNT FORTY-ONE

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about July 2019 to in or about September 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce A.J., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT FORTY-TWO

Attempted Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about July 2019 to in or about September 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received, and attempted to receive, visual depictions of A.J. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FORTY-THREE

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about April 2019 to in or about June 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, S.S., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FORTY-FOUR

Attempted Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about April 2019 to in or about June 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received, and attempted to receive, visual depictions of S.S. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FORTY-FIVE

Coercion and Enticement of a Minor to Engage in Unlawful Sexual Activity

The Grand Jury Further Charges:

From in or about November 2019 to in or about December 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did use a facility of interstate and foreign commerce, to wit, Snapchat, and other internet services, to knowingly attempt to persuade, induce, entice, and coerce E.A., a minor female who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT FORTY-SIX

Attempted Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about November 2019 to in or about December 2019, in the District of North Dakota,

DAWSON M. ROUSE

knowingly received, and attempted to receive, visual depictions of E.A. using a means and facility of interstate and foreign commerce, specifically, the internet, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FORTY-SEVEN

Transfer of Obscene Materials to a Minor

The Grand Jury Further Charges:

From in or about November 2019 to in or about December 2019, in the District of North Dakota, and elsewhere,

DAWSON M. ROUSE

did, by using any means of interstate commerce, knowingly transfer obscene matter to an individual, E.A., who had not attained the age of 16 years, knowing the individual had not attained the age of 16 years;

In violation of Title 18, United States Code, Section 1470.

COUNT FORTY-EIGHT

Attempted Sexual Exploitation of a Child

The Grand Jury Further Charges:

From in or about November 2019 to in or about December 2019, in the District of North Dakota,

DAWSON M. ROUSE

did knowingly use, persuade, induce, entice, and coerce, and attempted to use, persuade, induce, entice, and coerce a minor, namely, E.A., to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing, and having reason to believe, that such visual depictions if produced, as requested, would result in their transmission using a means and facility of interstate and foreign commerce, specifically, the internet;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of violating Title 18, United States Code, Section 2422(b), as charged in this Superseding Indictment,

DAWSON M. ROUSE

shall forfeit to the United States any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof, and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violations, including, but not limited to, the following:

- One iPhone XS; Serial number G0NXN3A4KPFX.

By virtue of commission of the felony offense as charged in this Superseding Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States pursuant to Title 18, United States Code, Section 2428.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Drew H. Wrigley
DREW H. WRIGLEY
United States Attorney

GLD:tmg